IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

| IN RE: PHILLIP E. REED |) | CHAPTER 13 |
|------------------------------|---|------------------------|
| SHANNON R. REED, |) | |
| DEBTORS |) | |
| |) | CASE NO. 1:18-BK-03120 |
| |) | |
| M&T BANK |) | |
| MOVANT |) | |
| |) | |
| PHILLIP E. REED |) | |
| SHANNON R. REED, |) | |
| RESPONDENTS |) | |
| CHARLES DEHART, III, TRUSTEE |) | |

DEBTORS' RESPONSE TO MOTION OF M&T BANK MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. 362 PURSUANT TO BANKRUPTCY PROCEDURE RULE 4001

- 1. Movant, M&T Bank, filed its Motion for Relief from Stay on April 3, 2020.
- 2. Debtors acknowledges some mortgage payments are past due.
- 3. Debtors desires the opportunity to cure any post-petition mortgage arrears and keep their home.
 - 4. Debtors requests the Court deny Movant's Motion for Relief.

WHERFORE, Debtors, Phillip E. Reed and Shannon R. Reed, prays the Court enter its order denying the Motion for Relief from the Automatic Stay that was filed April 3, 2020 by M&T Bank.

Dated: April 14, 2020

/s/Stephen Wade Parker
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